

September 15, 2020

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

**Via SCPSC E-FILING DMS**

**Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges;**

**Docket No. 2020-125-E**

Dear Ms. Boyd:


Please find attached for electronic filing with the South Carolina Public Service Commission a copy of the Petition to Intervene of Walmart Inc., in the above-referenced case. By copy of this letter, I am serving all parties of record via electronic mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By

  
Stephanie U. Eaton  
(SC Bar No. 80073)

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*Counsel to Walmart Inc.*

SUE/sds  
Attachments  
c: Certificate of Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2020-125-E

IN RE:	)	
	)	
Application of Dominion Energy South	)	<b>CERTIFICATE OF SERVICE</b>
Carolina, Incorporated for Adjustment of	)	
Rates and Charges	)	

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I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

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Stephanie U. Eaton (SC Bar No. 80073)

Dated: September 15, 2020

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2020-125-E

IN RE:	)	<b>PETITION TO INTERVENE OF</b>
	)	<b>WALMART INC.</b>
Application of Dominion Energy South	)	
Carolina, Incorporated for Adjustment of Rates	)	
and Charges	)	

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Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On August 14, 2020, Dominion Energy South Carolina, Inc. ("DESC" or "Company") filed an Application for adjustments in the Company's electric rate schedules and tariffs ("Application"). The Petition was filed pursuant to S.C. Code Ann. Sections 58-37-820, 58-27-860, and 58-27-870 (2015), and S.C. Code Ann. Regs. 103-823-(2012). The Application requests an increase of approximately \$178 million (or 7.75 percent) in retail revenues to be effective for bills rendered on or after the first billing cycle of March 2021.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, Arkansas 72716.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DESC. Walmart has approximately 37 facilities in South Carolina that are served by DESC, which include Walmart Supercenters, Sam's Clubs, gas stations and a distribution center. Walmart purchases more than 113 million kWh

annually from DESC. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DESC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina.

4. Walmart was also a party and active participant in Docket No. 2017-370-E wherein Dominion Energy, Inc., and South Carolina Energy Gas Company (SCE&G) obtained Commission approval to merge, forming DESC. As part of those proceedings, the Commission ordered DESC to file a subsequent rate case with new rates to go into effect January 1, 2021. Thus, the Application in this case is being filed as a result of Commission Order in the prior proceedings in which Walmart was a participant.

5. In light of the Company's proposed rate increase, the importance of other issues raised by the Application, such as Return on Equity and rate design, and Walmart's participation in the prior, related proceedings, Walmart will be impacted by, and has a direct and substantial interest in, the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from the Company pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

6. The attorneys representing Walmart in this proceeding are:

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 Carrie Harris Grundmann  
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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Grundmann be added jointly to the service list. Walmart may cause to be filed a motion for Mr. Williamson and/or Ms. Grundmann to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson and Ms. Grundmann be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

7. This Petition to Intervene is timely filed as interventions are due by October 30, 2020, per Notice of the Commission.

**WHEREFORE**, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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Dated: September 15, 2020